

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

2025 MAR 27 PM 2:06

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

STEVEN L. SNIPES,

Plaintiff,

v.

PRESBYTERIAN CHURCH (USA), and

BIG BLACK CREEK HISTORICAL ASSOCIATION,

Defendants.

CIVIL ACTION NO. _____

COMPLAINT FOR:

- (1) UNJUST ENRICHMENT (13TH AMENDMENT VIOLATION)
- (2) FRAUDULENT CONVEYANCE (TENN. CODE § 66-3-101)
- (3) CIVIL RIGHTS VIOLATIONS (42 U.S.C. § 1983)

I. PARTIES

1. **Plaintiff Steven L. Snipes** is a direct descendant of John Skidmore Snipes, an enslaved laborer who built the Denmark Presbyterian Church in 1854.
2. **Defendant Presbyterian Church (USA) (PCUSA)** is a religious corporation that benefited from slave labor and fraudulently transferred the Denmark Church.
3. **Defendant Big Black Creek Historical Association** is a Tennessee nonprofit that received the Denmark Church via fraudulent \$0 transfer in 2021.

II. JURISDICTION

This Court has jurisdiction under:

- 28 U.S.C. § 1331 (federal question - 13th Amendment violation)
- 28 U.S.C. § 1367 (supplemental state law claims)

III. FACTS

4. Slave Labor Construction: The Denmark Presbyterian Church was built in 1854 using enslaved labor, including Plaintiff's ancestor John Skidmore Snipes (per National Register of Historic Places).

5. Fraudulent Transfers:

- 1992: PCUSA transferred church to Cemetery Maintenance of Denmark Inc. for \$0
- 2021: Transferred to Big Black Creek Historical Association for 0 (*property valued at 600,000+*)

6. Unjust Enrichment: Defendants continue to benefit from property built by slave labor while denying restitution.

IV. CLAIMS FOR RELIEF

COUNT 1: UNJUST ENRICHMENT (13TH AMENDMENT VIOLATION)

7. Defendants retain benefits derived from slave labor in violation of the 13th Amendment's abolition of slavery.

COUNT 2: FRAUDULENT CONVEYANCE (TENN. CODE § 66-3-101)

8. The \$0 transfers were made to hinder, delay or defraud Plaintiff's restitution claims.

COUNT 3: CIVIL RIGHTS VIOLATIONS (42 U.S.C. § 1983)

9. Defendants systematically denied Plaintiff's rights to justice and reparations.

V. PRAYER FOR RELIEF

Plaintiff demands:

- A. 831,154,278,647.12 in damages (adjusted labor value);
- B. Co-ownership of Denmark Presbyterian Church;
- C. Injunctive relief freezing PCUSA's 14.6M reserve fund;
- D. Attorney's fees and costs;
- E. Any other relief the Court deems just.

VI. JURY DEMAND

Plaintiff demands trial by jury on all issues.

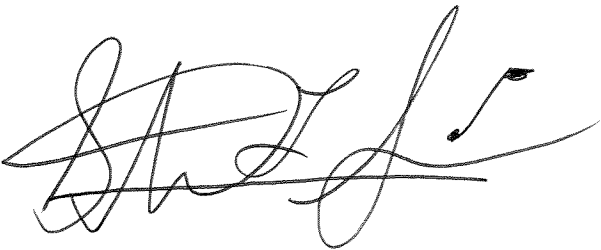
Dated: 3/27/2025

Respectfully submitted,

Steven L. Snipes, Pro Se

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A handwritten signature in black ink, appearing to read 'S. Snipes', with a horizontal line drawn underneath it.